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SO ORDERED 3/27/20

A handwritten signature in black ink, appearing to read "Alison J. Nathan".

Alison J. Nathan, U.S.D.J.

John K. Carroll
President

Janet E. Sabel
Attorney-in-Chief

Justine M. Luongo
Attorney-in-Charge
Criminal Practice

Via ECF

March 26, 2020

Hon. Alison J. Nathan, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Medina v. City of New York, et al., 19-cv-09412-AJN

Your Honor:

Plaintiff Tomas Medina submits this letter to request an extension of time to file and for leave to consolidate three memoranda of law into one with a limit of 50 pages. The current due date for these memoranda of law is March 31. This is Plaintiff's second request for an extension of time to file these memoranda. Counsel for both sets of defendants (those represented by Corporation Counsel of the City of New York and Defendant Nunez) consent to these requests.

The disruptions caused by the COVID-19 pandemic, particularly the Legal Aid Society's emergency efforts to have clients released from jails and prisons, have taken time away from finalizing the memoranda of law in opposition to the Corporation Counsel Defendants' partial motion to dismiss (ECF No. 59), Defendant Nunez's partial motion to dismiss (ECF No. 74), and the motion for Rule 11 sanctions (ECF No. 62). Therefore we request an extension of two weeks, which would make the new filing deadline April 14.

In addition, Plaintiff requests leave to consolidate the three above-mentioned memoranda of law into one, with a limit of 50 pages—rather than submitting three separate memoranda with a combined limit of 75 pages. Consolidation would permit us to respond only once to duplicative arguments made in the three motions.

SO
ORDERED

Respectfully submitted,

S/

William Alexander Lesman
alesman@legal-aid.org
212-298-3155

cc: All counsel of record via ECF